

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NORTHEASTERN DIVISION**

B.A.P., a minor child by and through)
her parent, RICHARD PENKOSKI;)
and RICHARD PENKOSKI, as the)
parent and legal guardian of B.A.P.,)
Plaintiffs,)
v.)
OVERTON COUNTY BOARD OF)
EDUCATION, RICHARD MELTON,)
and STEPHEN HENSON,)
Defendants.)

Case No. 2:20-cv-00065

Chief Judge Waverly D. Crenshaw, Jr.
Judge Alistair E. Newbern

JOINT MOTION TO REQUEST DISCOVERY CONFERENCE

Come now the parties, by and through counsel, and request a discovery conference with Judge Newbern in this case. The parties have conferred at length on discovery but have some issues that remain unresolved, including the possible need for a protective order concerning the 30(b)(6) deposition, and require judicial intervention in order to resolve.

WHEREFORE, the parties respectfully request this Court send the parties some dates that Judge Newbern is available to hold a conference and assist the parties in coming to a resolution on their disputes.

This 29th day of June, 2023.

Respectfully submitted,

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